

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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UNITED STATES OF AMERICA

CASE NO. 3:23-CR-0422-N

v.

CRISTIAN ANTONIO ACOSTA-LAZO (1)

FACTUAL RESUME

In support of Cristian Antonio Acosta-Lazo's plea of guilty to the offense in Count One of the indictment, Acosta-Lazo, the defendant; the defendant's attorney, Camille Knight; and the United States of America (the government) stipulate and agree to the following:

I. ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 21 U.S.C. § 846, that is, conspiracy to possess with the intent to distribute a controlled substance, the government must prove each of the following elements beyond a reasonable doubt¹:

Violation of 21 U.S.C. § 846 -

- First:* That two or more persons, directly or indirectly, reached an agreement to possess with intent to distribute methamphetamine, a Schedule II controlled substance;
- Second:* That the defendant knew of the unlawful purpose of the agreement;
- Third:* That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

¹ Fifth Circuit Pattern Crim. Jury Instructions 2.97 (5th Cir. 2019).

Fourth: That the overall scope of the conspiracy involved at least 500 grams or more of a mixture or substance containing a detectible amount of methamphetamine; and

Fifth: That the defendant knew or reasonably should have known that the scope of the conspiracy involved at least 500 grams or more of a mixture or substance containing a detectible amount of methamphetamine.

II. STIPULATED FACTS

Cristian Antonio Acosta-Lazo admits and agrees that beginning on or about September 14, 2023, and continuing through September 19, 2023, in the Dallas Division of the Northern District of Texas, that he, conspired with Reyna Aragon-Villatoro, Javier Pineda-Rivera, Kevin Alejandro Sanabria-Lazo, Guillermo Gonzalez Jr. and others, to knowingly possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of 21 U.S.C. 846 and 841(1)(a) and (b)(1)(A).

On September 14, 2023, agents purchased methamphetamine from Acosta-Lazo and followed him back to the apartment located at 3166 Chapel Creek Drive, Apartment #2055, Dallas, Texas (“the Apartment”), where Acosta-Lazo and other codefendants were living and converting methamphetamine into crystal form. On September 19, 2023, agents again communicated with Acosta-Lazo about another kilogram delivery and saw him leave the Apartment with Aragon-Villatoro, who was carrying a backpack that contained 1,972 grams of a mixture or substance containing methamphetamine. Law enforcement then stopped them and seized the methamphetamine. Thereafter, agents obtained and executed a search warrant at the Apartment and located Pineda-Rivera, Sanabria-Lazo, and Gonzalez Jr. inside the Apartment, who were actively converting the

methamphetamine into crystal form. The Apartment contained over 500 grams of mixture or substance containing detectable amount of methamphetamine in both liquid and crystalized forms and was located in the Northern District of Texas.

Acosta-Lazo agrees that he conspired to possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and that he committed each of the essential elements of the drug trafficking offense as set out in this factual resume. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support his guilty plea to Count One as set forth in the indictment.

AGREED AND STIPULATED on this 1 day of October, 2024.

X CA

Cristian Antonio Acosta-Lazo
Defendant

Camille Knight

Camille Knight
Attorney for Defendant

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